

RCRA Large Quantity Generator Checklist Summary of Violations

HAZARDOUS WASTE



This is an inspection element checklist of common types of violations of Federal, State, or local laws and regulations. For specific details about your inspection, refer to your Official Inspection Report.

SCC = Sacramento County Code / CCR = California Code of Regulations

HSC = California Health and Safety Code / CFR = Code of Federal Regulations

Checklist items apply to Large Quantity Generators (LQG) of Federal Resource Conservation and Recovery Act (RCRA) Hazardous Waste.

VIOLATION CODE	AUTHORITY	DESCRIPTION
Recordkeeping / Documentation		
Authorization		
3115	SCC 6.98.030	Generator has an active hazardous waste generator permit.
3110001	22 CCR 12 66262.18; HSC 6.5 25205.16(b)	Failure to obtain or maintain an Identification Number prior to treating, storing, disposing of, transporting or offering for transportation any hazardous waste. Maintenance of ID numbers must be annually verified using the Electronic Verification Questionnaire (eVQ). *Inspector verify by reviewing HWTS or contacting DTSC Business Operations unit at evq@dtsc.ca.gov
3110020	HSC 6.11 25404(e)(4)	Failure to report program data electronically.
3110031	22 CCR 12 66262.18(d)(2)	Failure to maintain ID number by notifying DTSC by March 1 of each even numbered year. Re-notification must be done by using EPA form 8700-12. (Biennial ID Notification)
3110	HSC 6.5 25110.10(d)	Remote Waste Consolidation Site Annual Notification submitted.
Contingency Plan		
3130018	22 CCR 12 66262.17(a)(6), 66262.260, 66262.265	Failure to prepare and implement a written Contingency Plan to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.
3110012	22 CCR 12 66262.17(a)(6), 66262.262	Failure to maintain a copy of the contingency plan and all its revisions at the facility and to submit a copy (including the Quick Reference Guide) to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services when first becoming subject to the Large Quantity Generator requirements or after amending the existing contingency plan.
3110011	22 CCR 12 66262.17(a)(6), 66262.261, 66262.263	Failure to include all of the following in the Contingency Plan: description of actions personnel will take in response to a release or emergency, arrangements with local authorities, list of emergency coordinators including name, addresses & phone numbers, list of emergency equipment and their physical description, location and capabilities, evacuation plan, and OES phone number. (If the owner or operator has already prepared a Spill Prevention, Control, and Countermeasures (SPCC) Plan or some other emergency or contingency plan, the owner or operator need only amend that plan to incorporate hazardous waste management provisions.) OR: Failure to review and immediately amend whenever: (1) Applicable regulations are revised; (2) The plan fails in an emergency; (3) The generator facility changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency; (4) The list of emergency coordinators changes; or (5) The list of emergency equipment changes.
3110032	22 CCR 12 66262.17(a)(6), 66262.256(b)	Failure to maintain documentation of the arrangements with the local fire department and other emergency response agencies; or if none exist, that the attempt to make the arrangements was made.
3140	22 CCR 15 66265.56(j)	Submitted a contingency plan activation report to DTSC
Training		
3120001	22 CCR 12 66262.17(a)(7)	Failure to provide employees with hazardous waste training program of class room, computer-based or electronic instructions or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with the requirements of 22 CCR Chapter 12, and/or failure to provide training within the first six months after the date of their employment or assignment to a facility, or to a new position at a facility and annually thereafter.

3110033	22 CCR 12 66262.17(a)(7)	Failure to maintain training records on current personnel until closure of the facility and for former employees for at least three years from the date the employee last worked at the facility. The Training Program Plan shall include the following: the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job; a written job description for each position, duties of facility personnel assigned to each position, and a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position.
3120003	22 CCR 12 66262.17(a)(7)(A)4	Failure to ensure that general awareness training and function specific job training are provided every 24 months.
3120004	22 CCR 12 66262.17(a)(7)(A)1	Failure to provide training to employees engaged in shipping hazardous waste commensurate with their responsibilities and 49 CFR 172.704 and to ensure re-training at least every 3 years.
Manifests		
3110002	22 CCR 12 66262.20	Failure to prepare a Uniform Hazardous Waste Manifest and, if necessary, a Continuation Sheet, before the transport of a hazardous waste off-site for transfer, treatment, storage, or disposal.
3110003	22 CCR 12 66262.23(a)	Failure to properly complete the Uniform Hazardous Waste Manifest.
3110004	22 CCR 12 66262.42	Failure to complete the Uniform Hazardous Waste Manifest exception requirements.
3110005	22 CCR 12 66262.40(a)	Failure to keep a copy of each properly signed manifest for at least three years from the date the waste was accepted by the initial transporter. The manifest signed at the time the waste was accepted for transport shall be kept until receiving a signed copy from the designated facility which received the waste.
3110006	22 CCR 12 66262.23(a)(4); HSC 6.5 25160(b)(1)(C)	Failure to send a legible copy of each hazardous waste manifest that originated in paper form to DTSC within 30 days of each shipment of hazardous waste.
3110017	HSC 6.5 25160.2	Failure of a generator of hazardous waste that meets the conditions to be transported on a consolidated manifest to comply with one or more of the required consolidated manifesting procedures and retain copies of receipts for three years.
Waste Determination		
3130001	22 CCR 12 66262.11	Failure to determine if the waste generated is a hazardous waste.
3130028	22 CCR 12 66262.40(c)	Failure to keep records of any test results, waste analyses, or other determinations made in accordance with section 66262.11 for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.
3130002	22 CCR 12 66262.17(a)(9); 22 CCR 18 66268.7(a)	Failure to determine whether waste is restricted from land disposal.
3130034	HSC 6.5 25144.6 (b)	Failure to properly manage reusable soiled textile materials prior to being sent for laundering.
3130035	HSC 6.5 25200.3.1(b)	Failure of the owner or operator managing laboratory hazardous waste in a laboratory accumulation area to comply with the quantity limitations, management, training, or documentation requirements.
3130036	HSC 6.5 25200.3.1(c)	Failure to treat laboratory hazardous waste according to all of the following requirements: 1) treated in containers and follow published procedures, 2) at a location as close as practical, and within 10 days, 3) single batch quantity limit to be 5 gallons or 18 kilograms, whichever is greater, 4) waste from a single procedure or from the same laboratory process, 5) performed by trained personnel, 6) training records are maintained for 3 years, 7) waste and residuals are managed according to applicable requirements, and 8) records are made available for inspection.
Reporting		
3110008	22 CCR 31 67100.7, 67100.8	Failure of a generator to conduct, when required, a source reduction evaluation review and plan every four years, and/or failure of the review and plan to contain all required information.
3110009	22 CCR 31 67100.9	Failure of a large quantity generator to prepare a summary progress report every four years, using DTSC's Form # 1262 (3/99) titled "Summary Progress Report".
3110010	22 CCR 31 67100.3, 67100.4, 67100.5; HSC 6.5 25244.19, 25244.21	Failure to adequately complete, and maintain for review, all requirements of the source reduction evaluation review and plan (SB-14).
3110007	22 CCR 12 66262.40(b); 66262.41	Failure of a large quantity RCRA generator to prepare the Biennial report (Form 8700), and submit to DTSC by March 1st on even numbered years ; and maintain it onsite for three years.
3110022	HSC 6.5 25110.10(d)	Failure to annually submit notification of generator's intent to remotely consolidate hazardous waste.

Hazardous Waste Management		
Accumulation time limits		
3130004	22 CCR 12 66262.17(a), 66262.17(e); HSC 6.5 25123.3(b)(1)	Failure to send hazardous waste offsite for treatment, storage, or disposal within 90 days for a generator who generates 1000 kilograms or more of RCRA hazardous waste or one kilogram of acute hazardous waste per month.
Certified Appliance Recycler		
3110024	HSC 6.5 25211.4	Failure to obtain Certified Appliance Recycler certification (CAR) from DTSC.
3130033	HSC 6.5 25212	Failure of certified appliance recycler (CAR) to properly remove and dispose of all materials that require special handling (MRSH).
3110025	HSC 6.5 25211.2, 25211.3	Failure of certified appliance recycler (CAR) to provide documentation that all materials that require special handling (MRSH) have been properly removed and managed.
Container Management		
3130003	22 CCR 12 66262.17(a)(5)(A)	Failure to properly label hazardous waste accumulation containers with the following requirements: "Hazardous Waste", name and address of the generator, physical and chemical characteristics of the Hazardous Waste, and starting accumulation date.
3130005	22 CCR 12 66262.17(a)(1)(B), 66262.15(a)(1)	Failure to: (1) Accumulate hazardous waste in a container that is in good condition. (2) Immediately transfer the hazardous waste from a leaking container to a container that is in good condition; or (3) Immediately manage the waste in some other way that complies with waste management requirements.
3130006	22 CCR 12 66262.17(a)(1)(C), 66262.15(a)(2)	Failure to accumulate or store hazardous waste in a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.
3130008	22 CCR 12 66262.17(a)(1)(E)	Failure to inspect weekly areas where hazardous waste containers are stored. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors.
3130007	22 CCR 12 66262.17(a)(1)(D), 66262.15(a)(4)	Failure to meet the following container management requirements:(a) A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. (b) A container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.
3130009	22 CCR 12 66262.17(a)(1)(F)1	Failure to keep reactive and ignitable waste at least 15 meters (50 feet) from the facility's property line.
3130010	22 CCR 12 66262.17(a)(1)(G)	Failure to: (1) Store incompatible wastes and/or material in the same container or an unwashed container without ensuring it does not (a) generate extreme heat or pressure, fire or explosion, or violent reaction; (b) produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (c) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (d) damage the structural integrity of the device or facility containing the waste; or (e) through other like means threaten human health or the environment; or (2) Separate a container accumulating hazardous waste that is incompatible with any waste or material stored in any other container, piles, open tanks, or surface impoundments by means of a dike, berm, wall, or other device.
3130024	22 CCR 11 66261.7	Failure to manage empty containers greater than 5 gallons in capacity that previously held a hazardous material/waste including but not limited to the following: (1) By reclaiming its scrap value onsite or shipping the container or inner liner to a person who reclaims its scrap value; or (2) By reconditioning or remanufacturing the container or inner liner onsite for subsequent reuse, or shipping the container or inner liner to a person who reconditions or remanufactures the container or inner liner; or (3) By shipping the container or inner liner to a supplier or to another intermediate collection location for accumulation prior to managing the container or inner liner pursuant to subsections (e)(2) or (e)(3) of 22 CCR 11 66261.7; or (4) By shipping the container or inner liner back to the supplier for the purpose of being refilled; and, (5) A container or an inner liner removed from a container shall be marked with the date it has been emptied and shall be managed within one year of being emptied.
3130025	22 CCR 12 66262.17(a)(1)(A)	Failure to comply with air emission requirements as specified in articles 27, 28, and 28.5 of chapter 15.

Satellite Accumulation		
3130023	22 CCR 12 66262.15(a)	<p>Failure to meet the following conditions of satellite accumulation regulations:</p> <ul style="list-style-type: none"> • Accumulate up to 55 gallons of hazardous waste or one quart of acute hazardous waste at or near the initial point of accumulation which was under the control of the operator. • Total time hazardous waste can be accumulated onsite in any generator accumulation area is either one year from the initial date of accumulation, or, 90 days from the date of which the quantity limit of 55 gallons of hazardous waste or one quart of acutely hazardous waste is reached, whichever comes first. • The container must be clearly marked with the initial date that hazardous waste is first placed in the container and labelled with the words "Hazardous Waste" including specified information. • Container must be labelled with the date the satellite accumulation limit is reached and moved within three days after reaching the 55 gallon (or one quart) limit to a central accumulation area. • 55 gallons (or one quart of acute hazardous waste) of waste per process may be accumulated.
Tank Management		
3130011	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.194	<p>Failure to comply with general tank operating requirements:</p> <p>(a) Hazardous wastes or treatment reagents shall not be placed in a tank system if they could cause the tank, its ancillary equipment, or the secondary containment system to rupture, leak, corrode, or otherwise fail.</p> <p>(b) The owner or operator shall use appropriate controls and practices to prevent spills and overflows from tank or secondary containment systems. These include at a minimum: (1) spill prevention controls (e.g., check valves, dry discount couplings); (2) overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank); and (3) maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind action or by precipitation. Uncovered tanks shall be operated to ensure at least 60 centimeters (2 feet) of freeboard, unless the tank is equipped with a containment structure (e.g., dike or trench), a drainage control system or a diversion structure (e.g., standby tank) with a capacity that equals or exceeds the volume of the top 60 centimeters (2 feet) of the tank.</p>
3110013	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(a)	Failure to obtain and maintain a written assessment reviewed and certified by an independent, qualified, professional engineer prior to placing the tank system in service. The written assessment shall state that, the new hazardous waste tank system has sufficient structural integrity, is acceptable for the transferring, storing and treating of hazardous waste, and that the tanks and containment system including the foundation, structural support, seams, connections, and pressure controls (if applicable) are suitably designed to meet the regulation.
3110014	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(k)	Failure to include all required information in the new tank system assessment.
3110023	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(h)	Failure of generator to obtain assessment or reassessment every five (5) years or the remaining service life of the tank system, as stated in the engineer's assessment, whichever is less. This assessment applies to onground or aboveground tank systems containing only non-RCRA hazardous wastes generated onsite, or for a small quantity generator onground or aboveground tank systems containing RCRA hazardous wastes generated onsite.
3110015	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.192(m)	<p>Failure to obtain CUPA approval prior to the replacement of identical or functionally equivalent tank. The notification to the CUPA of replacement shall include the following:</p> <ol style="list-style-type: none"> (1) Name, address, and EPA identification number of the facility; (2) Date of planned replacement; (3) Description part or component to be replaced; (4) Description of the tank system and type of waste(s) handled; (5) Description of how the part or component is identical or functionally equivalent to the part or component to be replaced.
3130012	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.195(a), 66265.195(c)	Failure to conduct and document inspections of hazardous waste tank systems each operating day and retain records of those inspections at the facility.
3130019	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.193	Failure to meet required secondary containment requirements for hazardous waste tank systems or components.
3150002	22 CCR 12 66262.17(a)(8)(A), 66262.17(a)(8)(C)	<p>Failure of owner or operator to:</p> <ol style="list-style-type: none"> (1) Place a notice in the operating record within 30 days after closure identifying the location of the waste accumulation unit within the facility; or (2) Properly close a hazardous waste tank system ensuring the minimization of further maintenance and that the required requirements have been met. (3) Notify DTSC using form 8700-12 within 90 days of closure of the waste accumulation unit.
3140001	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.196	Failure to immediately remove from service a tank system or secondary containment system from which there has been a leak, spill, is unfit for use and comply with applicable requirements.
3130020	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.195(b), 66265.195(c)	Failure of the owner or operator to inspect and document the cathodic protection systems to ensure the proper operation within six months after initial installation, and annually thereafter; and all sources of impressed current at least bimonthly (i.e., every other month).

3130022	22 CCR 12 66262.17(a)(5)(B)	Failure to label stationary hazardous waste tanks "hazardous waste", mark the tank with the hazard(s) of the waste, and mark with an accumulation start date. May use a log or other record to show that a batch tank has been emptied within the applicable accumulation time period or for flow through systems, demonstrate using tank volumes and flow rates that waste entering the tank would exit the tank within the applicable accumulation time period.
3130026	22 CCR 12 66262.17(a)(2); 22 CCR 15 66265.202	Failure to comply with air emission requirements as specified in articles 27, 28, and 28.5 of chapter 15.
Recyclable Materials		
3110021	HSC 6.5 25143.10	Failure of any person who recycles more than 100 kilograms per month of recyclable material under a claim that the material qualifies for exclusion or exemption, to submit recyclable materials report every two years.
3150004	HSC 6.5 25143.2, 25143.9	Failure to properly manage a recyclable material.
Used Oil		
3150005	HSC 6.5 25250.7(a)	Failure to prevent intentional contamination of used oil with other hazardous waste other than minimal amounts of vehicle fuel.
3110018	HSC 6.5 25250.19(c), 25250.18(a), 25250.1(c)	Failure to record in an operating log and retain for three years the following information for each shipment of recycled or exempted oil: 1) The name and address of the used oil recycling facility or generator claiming the oil meets the requirements of HSC 6.5 25250.1. 2) The name and address of the facility receiving the shipment. 3) The quantity of oil delivered. 4) The date of shipment or delivery. 5) A cross-reference to the records and documentation required under HSC 6.5 25250.1.
Used Oil and Fuel Filters		
3130029	22 CCR 16 66266.130; HSC 6.5 25250.22	Failure to properly manage used oil filters and/or fuel filters in accordance with the requirements.
Lead Acid Batteries		
3130	22 CCR 16 66266.81(a)	Generator of more than ten spent lead-acid batteries in a year meets all requirements
3130031	22 CCR 16 66266.81(a)(3)	Failure of facilities that accept spent lead acid batteries in exchange or partial exchange for operable lead-acid storage batteries to comply with storage requirements by violating one of the following: 1) Storing more than one ton of spent batteries at any one location for more than 180 days. 2) Storing one ton or less of spent batteries at any one location for more than one year, or 3) Removing the electrolyte.
3130030	22 CCR 16 66266.81(a)(1)	Failure to meet the spent lead acid battery management requirements, when handling, storing, or transporting more than 10 lead acid batteries at any one time.
3130032	22 CCR 16 66266.81(b)	Failure to properly manage, store, and label a damaged lead acid battery in a nonreactive, structurally secure, closed container, and/or failure to label damaged lead acid battery with the date that the first battery in the container was placed there with ink, paint or other weather-resistant material so as to minimize the release of acid and lead and to protect the environment.
3110019	22 CCR 16 66266.81(a)(4)(B)	Failure to retain for at least three years a legible copy of each manifest or bill of lading which identifies spent lead-acid storage batteries shipped to a person who stores the batteries or who uses, reuses, recycles or reclaims the batteries or their components.
Disposal		
3150001	HSC 6.5 25163(a)	Failure to use a DTSC registered hazardous waste transporter to transport hazardous waste or transporting hazardous waste without being a DTSC registered hazardous waste transporter.
3140002	HSC 6.5 25187.6	No person shall remove, transfer, or dispose of the hazardous waste until permission for removal, transfer, or disposal is given by an authorized agent.
3150003	22 CCR 12 66262.18(c); HSC 6.5 25189.5(a)	Failure to dispose of hazardous waste at a facility which has a permit from DTSC or disposing of hazardous waste at any point which is not authorized or which does not have a valid ID number.
3150007	HSC 6.5 25201(a)	Failure to obtain a hazardous waste facilities permit, or other grant of authorization, prior to accepting, treating, storing, or disposing of a hazardous waste at the facility, area, or site.
General Facility Operations		
Site Safety		
3130013	22 CCR 12 66262.17(a)(6), 66262.251	Failure to maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

3130014	22 CCR 12 66262.17(a)(6), 66262.252	<p>Failure of the facility to maintain the following emergency equipment or equivalents, unless none of the hazards posed by waste handled at the facility could require the particular kind of required equipment:</p> <ol style="list-style-type: none"> 1) An internal communications or alarm system*; 2) A device, such as a telephone (immediately available at the scene of Operations/Maintenance) or a hand-held two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams*; 3) Portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment; and 4) Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems. <p>* Communications and alarm systems must be deployed at all waste handling areas at the time of handling</p>
3130015	22 CCR 12 66262.17(a)(6), 66262.253	Failure of the facility to test and maintain as necessary all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment to assure its proper operation in time of emergency.
3130016	22 CCR 12 66262.255	Failure to maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.
3130	22 CCR 15 66265.17(a)	Takes precautions to prevent accidental ignition or reaction of a hazardous waste
3130	22 CCR 15 66265.14	Entry into active portions of the facility controlled and required signage posted
3130037	22 CCR 12 66262.17(a)(6), 66262.264	Failure to have at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures.
3130027	22 CCR 12 66262.17(a)(3); 22 CCR 15 66265.440 - 66265.445	Failure to comply with Drip Pad requirements, including but not limited to design and operating requirements, annual assessment, contingency plan, inspections, and closure requirements.
Universal Waste		
>5000 Kg		
3110	22 CCR 23 66273.32(b)	UWH who accumulates 5,000 kg or more of non-RCRA UW obtained an EPA ID number from DTSC
3110026	22 CCR 23 66273.32(a)	Failure of a universal waste handler to send written notification of universal waste management to the USEPA Regional Administrator and obtain a federal ID Number prior to accumulating 5,000 kilograms or more of RCRA universal waste.
DTSC notification for Electronic Devices, CRT's and CRT glass		
3110027	22 CCR 23 66273.32(c), 66273.32(e)	Failure of a universal waste handler of PV modules, electronic devices, CRTs, and/or CRT glass who might accept and accumulate, but not treat, any PV module, electronic device, CRT, and/or CRT glass from an offsite source to submit notification with all required information to DTSC no later than 30 calendar days prior to accepting any above noted waste.
3110028	22 CCR 23 66273.32(d)(1), 66273.32(d)(2), 66273.32(f)(1), 66273.32(f)(2)	Failure of a universal waste handler who either: 1) accepts more than 100 kilograms (or 220 pounds) of PV modules or electronic devices, CRTs, and CRT glass calculated collectively, from any offsite sources in a calendar year, or 2) generates 5,000 kilograms (or 11,000 pounds; e.g., about 200 CRTs) or more of PV modules or electronic devices, CRTs, and CRT glass calculated collectively, in a calendar year, to submit to DTSC by February 1 of every year a an annual report that includes all required information.
Training		
3120002	22 CCR 23 66273.36	Failure of universal waste handler to provide initial and/or annual refresher training for employees who manage or handle universal waste and to maintain a written record for three years of personnel who took the initial or annual training.
UW Management		
3130038	22 CCR 23 66273.34	<p>Failure to label or mark each individual or container or the designated area of universal waste with the following:</p> <ol style="list-style-type: none"> 1. Waste batteries shall be marked with "Universal Waste-Battery(ies)". 2. Mercury containing equipment shall be marked with "Universal Waste -Mercury-Containing Equipment". 3. Lamps shall be marked with "Universal Waste-Lamp(s)". 4. Electronic devices or the container or pallet where the devices are stored shall be marked with "Universal Waste-Electronic Device(s)". 5. CRTs or the container or pallet where CRTs are stored shall be marked with "Universal Waste-CRT(s)". 6. Container for CRT glass shall be marked with "Universal Waste-CRT glass". 7. PV modules shall be marked with "Universal Waste-PV Module(s)".

3130039	22 CCR 23 66273.35	Failure to accumulate universal waste for one year or less and to demonstrate the length of time that the universal waste has been accumulated from the date it became a waste or was received.
3130	22 CCR 23 66273.2(a), 66273.33(a)	UWH properly manages batteries destined for reclamation or recycling
3130	22 CCR 23 66273.4, 66273.33(c)	UWH properly manages mercury containing-equipment which is destined for reclamation/recycling
3130	22 CCR 23 66273.5, 66273.33(b)	UWH properly manages lamps which are destined for reclamation/recycling
3110030	HSC 6.5 25201.16(j)	Failure to notify the CUPA of aerosol can processing procedures prior to commencement of operations.
3130040	HSC 6.5 25201.16(f)	Failure to comply with the applicable requirements related to accumulation and containment standards for universal waste aerosol cans.
3130041	HSC 6.5 25201.16(e)	Failure of the universal waste handler to manage universal waste aerosol cans in a manner that prevents fire, explosion, and the unauthorized release of any universal waste or component of a universal waste to the environment.
3140003	22 CCR 23 66273.33, 66273.33.5, 66273.33.6, 66273.37	Failure of the universal waste handler to prevent the release of the universal waste to the environment under reasonable conditions by the following methods: 1) Immediately clean spills and leaks of universal wastes; and 2) Place all universal waste spills and leaks in containers that are structurally sound and compatible with the universal waste.
Shipments and Tracking		
3130042	22 CCR 23 66273.38; 49 CFR 1 172	Failure of the universal waste handler to transfer universal waste to another universal waste handler, or appropriate destination facility. Failure to package, label, mark and placard shipments and prepare shipping papers for any universal waste that meets the hazardous materials definition in accordance with DOT 49 CFR parts 171-180.
3110	22 CCR 23 66273.39	UWH maintained shipment records
3150006	22 CCR 23 66273.31(a), 66273.8(b)	Failure of the universal waste handler to prevent improper disposal of universal waste, or to transfer universal waste to the appropriate destination facility.
Exports		
3110029	22 CCR 23 66273.40(a)(2), (3) and (4)	Failure of the universal waste handler who sends electronic devices, CRTs, and/or CRT glass to any foreign destination to comply with the following: (1) Notify DTSC 60 days prior to the intended export before any electronic devices, CRTs, and/or CRT glass are scheduled to leave the United States and cover all export activities extending over the next twelve (12) month or lesser period; (2) Concurrently send a copy of the notification required pursuant to subsection 66273.40(a)(2)(B) of 22 CCR to the CUPA having jurisdiction over the universal waste handler's facility; (3) sign the export notification; and (4) include all required information in the export notification.
General		
3110	22 CCR Multiple Multiple; HSC 6.5 Multiple	RCRA Large Quantity Generator - Administration/Documentation - General
3115	Sac County Multiple	RCRA Large Quantity Generator - Administration/Documentation - General Local Ordinance
3120	22 CCR Multiple Multiple; HSC 6.5 Multiple	RCRA Large Quantity Generator - Training - General
3125	Sac County Multiple	RCRA Large Quantity Generator - Training - General Local Ordinance
3130	22 CCR Multiple Multiple; HSC 6.5 Multiple	RCRA Large Quantity Generator - Operations/Maintenance - General
3135	Sac County Multiple	RCRA Large Quantity Generator - Operations/Maintenance - General Local Ordinance
3140	22 CCR Multiple Multiple; HSC 6.5 Multiple	RCRA Large Quantity Generator - Release/Leaks/Spills - General

3145	Sac County Multiple	RCRA Large Quantity Generator - Release/Leaks/Spills - General Local Ordinance
3150	22 CCR Multiple Multiple; HSC 6.5 Multiple	RCRA Large Quantity Generator - Abandonment/Illegal Disposal/Unauthorized Treatment - General
3155	Sac County Multiple	RCRA Large Quantity Generator - Abandonment/Illegal Disposal/Unauthorized Treatment - General Local Ordinance

09/17/2024 RVF W:\Data\FORMSARCHIVE\CUPA Current - HS GovTech Checklist\Word Doc Checklist\RCRA LQG CHECKLIST SUMMARY OF VIOLATIONS 09.17.2024.docx

RETURN TO COMPLIANCE STATEMENT

This *Return To Compliance Statement* must be returned to EMD within 19 days of your facility's inspection for Priority Corrective Action violations and within 35 days for all other violations (unless otherwise noted on the Official Inspection Report). Also include copies of any proof of compliance documents (e.g. photos, copies of manifests/disposal records or receipts, or other original paperwork).

Compliance Certification

1. I certify that the violations noted on the Official Inspection Report (and accompanying inspection checklists) have been corrected in the manner indicated below.
2. I have personally examined any attached documentation submitted as proof of compliance and I believe the information to be true, accurate and complete.
3. I am aware that there are significant penalties for submitting false information and/or for non-compliance with violations noted.
4. I declare under penalty of perjury that the foregoing certification is true and correct.

Executed at: _____, California

Date: _____

Facility Name: _____

Facility ID# (FA): _____

Signature: _____

Printed Name: _____

Position/Title: _____

SUMMARY OF VIOLATION COMPLIANCE ACTION

Violation Code	Check Type of Evidence Submitted			Violation Code	Check Type of Evidence Submitted			Violation Code	Check Type of Evidence Submitted		
	Photo	Paperwork	Statement		Photo	Paperwork	Statement		Photo	Paperwork	Statement
3115	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3150007	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130005	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110020	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130006	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130014	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110031	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130008	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130015	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130007	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130016	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130018	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130009	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110012	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130010	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110011	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130024	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130037	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110032	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130025	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130027	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3140	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130023	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3120001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130011	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110026	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110033	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110027	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3120003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110014	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110028	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3120004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110023	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3120002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110015	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130038	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130012	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130039	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130019	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110005	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3150002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110006	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3140001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110030	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110017	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130020	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130040	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130022	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130041	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130028	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130026	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3140003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110021	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130042	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130034	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3150004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130035	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3150005	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3150006	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130036	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110018	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110029	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110008	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130029	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110009	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3115	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110010	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130031	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3120	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110007	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130030	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3125	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110022	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130032	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3130	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130004	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3110019	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3135	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
311024	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3150001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3140	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3130033	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3140002	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3145	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3110025	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3150003	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3150	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

RETURN TO COMPLIANCE STATEMENT

Corrective Action Statement: